

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
)	
v.)	
)	
JOSEPH CARAMADRE)	Criminal No. 11-186-S
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
)	
Defendants)	

DEFENDANT JOSEPH CARAMADRE'S MOTION FOR
LEAVE TO FILE SURREPLY MEMORANDUM

Defendant Joseph Caramadre hereby moves this Honorable Court pursuant to Local Rule Criminal 47(b)(2) for leave to file the attached Surreply Memorandum of Law in support of his Opposition to the United States' Motion to Disqualify Counsel Based on Conflict of Interest.¹ On July 16, the government filed a Reply Memorandum in support of its Motion to Disqualify. The government's Reply Memorandum misstates and mischaracterizes the issues before the Court and the government fails to explain the significant factual differences between the cases it cites and the facts of this case.

For the foregoing reasons, the defendant requests leave to submit the attached Surreply Memorandum to address these misstatements and mischaracterizations and to explicate the important factual distinctions between the cases cited by the government and this case.

¹If the court is disinclined to grant this Motion, defendant alternatively requests that the court strike the government's Reply Memorandum (Document 65) filed on July 16, 2012, as it was improperly filed without leave of court in contravention of Local Rule Criminal 47(b)(2).

Respectfully submitted,
JOSEPH CARAMADRE
By and through his Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2012, a copy of the foregoing Defendant Joseph Caramadre's Motion for leave to file a Surreply Memorandum was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Michael J. Lepizzera, Jr.
Michael J. Lepizzera, Jr.